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November 4, 2021

Via ECF

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, N.Y. 10007

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
November 5, 2021

Re: *United States v. Shmuel Abraham*, 20-cr-411-RA

Dear Judge Abrams:

We write to respectfully request permission for Shmuel Abraham to travel to Ukraine from November 10–14 for a religious pilgrimage to the gravesites of certain rabbis buried there.

Mr. Abraham, who is charged with wire fraud relating to his Amazon business, was released on August 19th of last year on a \$2,000,000 PRB, co-signed by 3 FRPs, and secured by \$50,000 in cash and his home, and both he and his wife surrendered their passports and are not allowed to apply for new ones. Dkt. #17.

Mr. Abraham's synagogue, Kahal Kinyan Torah in Airmont, is running a pilgrimage to the gravesites of certain rabbis buried in Ukraine and, at the urging of his rabbi, Mr. Abraham would like to participate. The trip, run under the aegis of his rabbi, will leave New York on November 10 and return on November 14. Mr. Abraham will be traveling on this trip by himself, and his wife and child will remain in the United States.

We have provided an itinerary of the trip to the U.S. Attorney's Office and will provide a full itinerary to pre-trial if this request is granted.

I have spoken to Mr. Abraham's pre-trial officer, who takes no position on this request, and AUSA Kamal, who also takes no position. We note that the Court has previously granted permission for one of the other defendants in this case to travel to Europe on a religious pilgrimage. *See* Dkt. 43.

We therefore respectfully request that the Court modify Mr. Abraham's bail conditions so as to allow him to travel to Ukraine from November 10–14 (with a brief stopover in an airport in Turkey), as well as order pre-trial to temporarily return Mr. Abraham's passport to him.

Respectfully submitted,

/s/

Gedalia M. Stern

CC: AUSA Jilan Kamal (via ECF)